

**REMARKS**

***Status of the Application***

Claim 1 is amended to recite the limitations of claims 14 and 104.

Claim 26 is amended to recite the limitations of claims 39 and 104.

Claim 51 is amended to recite the limitations of claims 64 and 104.

Claims 22, 24, 47, 49, 72, 74, 76, 77, and 78 are amended in a similar manner to the amendments made to claims 1, 26 and 51.

Claims 40, 41, 65 and 66 are amended to conform with amendments made to independent claims 26 and 51 respectively.

Claims 14, 39, 64 and 104 are hereby cancelled without prejudice or disclaimer. Accordingly claims 1-13, 15-38, 40-63, 65-103, and 105 are all the claims pending in the application.

***Claim Rejections - 35 U.S.C. § 103***

The Examiner has rejected claims 1-104 under U.S.C. § 103(a) as being unpatentable over Loveman et al. (U.S. Patent No. 6,211,869; hereinafter "Loveman") in view of Clarin et al. (US. Patent No. 6,414,725, hereinafter "Clarin") further in view of "VideoUniversity.com" (hereinafter "VideoUniversity"). These rejections are respectfully traversed.

Claim 1 is amended to recite the limitations of claims 14 and 104. Claim 1 recites a content production system, comprising, *inter alia*, a retrieval apparatus retrieving a portion of content from the higher resolution content corresponding to the selected portion of lower resolution content wherein timecodes identifying corresponding portions of the lower resolution

and higher resolution content are stored with the lower resolution and higher resolution content, respectively, wherein the timecodes of the lower resolution content and the higher resolution content are analyzed for time synchronization of the lower resolution content with the higher resolution content, the time synchronization performed by calibrating for an offset of time between the lower resolution and the higher resolution content by utilizing a frame number and timecode associated with a current frame.

The Examiner alleges that Loveman discloses storing timecodes with the higher and lower resolution content respectively. These timecodes identify corresponding portions of the higher and lower resolution content. The Examiner cites col. 20, lines 19-39 of Loveman in making this allegation. Applicant respectfully disagrees.

Claim 1 recites timecodes identifying corresponding portions of the lower resolution and higher resolution content and storing these timecodes with the lower resolution and higher resolution content, respectively. The section of Loveman cited by the Examiner discloses storing a "time code stamp" with the higher and lower resolution versions of the media data (Loveman, col. 20, lines 19-39). However, Loveman's "time code stamp" does not meet the limitations recited in claim 1 concerning the claimed timecodes. This is because Loveman teaches using the "time code stamp" merely to locate a high resolution version of a corresponding low resolution version. In contrast, the timecodes recited in claim 1 identify corresponding portions of the lower resolution and higher resolution content.

Also, Loveman does not teach or suggest that timecodes "are stored with the lower resolution and higher resolution content, respectively." Although Loveman discloses identifying "a portion of the second compressed version that corresponds to the portion of the first

compressed version,” Loveman does not teach or suggest identifying those portions of the versions of content using timecodes stored with the content (Loveman, col. 6, lines 35-49). Rather, Loveman merely discloses “storing file identification information and timecode data in a file” and searching this separate file. In contrast, the timecodes recited in claim 1 are stored with the lower resolution and higher resolution content, respectively.

The Examiner alleges that Loveman discloses a verification process where timecodes of the lower resolution content and the higher resolution content are analyzed for time synchronization of the lower resolution content with the higher resolution content. The Examiner asserts that the time synchronization is performed by calibrating for an offset of time between the lower resolution and the higher resolution content. Applicant respectfully disagrees.

Applicant has recognized that even with the use of timecodes for synchronization, an offset in time may exist between the higher resolution and lower resolution content. Applicant also has recognized that the encoding process needs to ensure the timecodes align as much as possible in order to be as frame-accurate as possible (paragraph [0039]). Accordingly, Applicant has invented a verification process that analyzes the timecodes of the higher and lower resolution content and calibrates for this offset. Claim 1 reflects this by reciting that “the timecodes of the lower resolution content and the higher resolution content are analyzed for time synchronization of the lower resolution content with the higher resolution content, the time synchronization performed by calibrating for an offset of time between the lower resolution and the higher resolution content”. Loveman, however, does not teach or suggest such an offset in time.

Loveman teaches achieving correspondence between the first and second compressed versions only by using timecodes. Loveman fails to teach or suggest verification, analysis or

calibration of the correspondence, much less by analyzing the timecodes as required by claim 1. The Examiner asserts that any offset in time between Loveman's high and low resolution versions is inherently calibrated by Loveman. However, Applicant respectfully submits that Loveman does not necessarily calibrate for an offset since Loveman does not even recognize an offset may exist.

Additionally, even if Loveman calibrates for an offset inherently as alleged by the Examiner, claim 1 recites "the time synchronization [is] performed...by utilizing a frame number and timecode associated with a current frame". Loveman fails to teach or suggest using a frame number of a frame in conjunction with the timecode associated with that frame when establishing correspondence between the first and second compressed versions. Consequently, Applicant submits that the Examiner's reasoning is merely a result of hindsight.

Further, neither Caronni nor VideoUniversity, taken individually or in combination, make up the deficiencies of Loveman.

Thus, Applicant respectfully submits that independent claim 1 is patentable over the applied references for *at least* the reasons discussed above.

Independent claims 22, 24, 26, 47, 49, 51, 72, 74, 76, 77, 78 recite one or more features analogous to those given above with respect to claim 1. Therefore Applicant respectfully submits that independent claims 22, 24, 26, 47, 49, 51, 72, 74, 76, 77, 78 are patentable for *at least* reasons similar to those given above with respect to claim 1.

Applicant respectfully submits that dependent claims 2-13, 15-21, 23, 25, 27-38, 40-46, 58, 50, 52-63, 65-71, 73, 75 and 79-103 are patentable *at least* by virtue of their dependency on their respective independent claim.

**Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,


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